

EXHIBIT DD



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Transcript of Jeffrey Green

Date: February 22, 2025

Case: Headwater Research LLC -v- Samsung Electronics Co, Ltd, et al.

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Transcript of Jeffrey Green
Conducted on February 22, 2025

1 (1 to 4)

1	IN THE UNITED STATES DISTRICT COURT	1	APPEARANCES
2	FOR THE EASTERN DISTRICT OF TEXAS	2	
3	MARSHALL DIVISION	3	ON BEHALF OF THE PLAINTIFF:
4	HEADWATER RESEARCH LLC,)	4	Paul Kroeger, Esquire
5	Plaintiff,)	5	RUSS AUGUST & KABAT
6	VS) Case No.	6	12424 Wilshire Boulevard, 12th Floor
7	SAMSUNG ELECTRONICS CO.,) 2:23-CV-00641	7	Los Angeles, California 90025
8	LTD and SAMSUNG)	8	310.826.6991
9	ELECTRONICS AMERICA, INC.,)	9	
10	Defendants.)	10	ON BEHALF OF THE DEFENDANT:
11	REMOTE VIDEOTAPED DEPOSITION OF	11	Steffen Lake, Esquire
12	JEFFREY GREEN	12	FISH & RICHARDSON, PC
13	February 22, 2025	13	1180 Peachtree Street NE
14		14	21st Floor
15		15	Atlanta, Georgia 30309
16		16	404.892.5005
17		17	
18		18	Also Present:
19		19	John Gugarty, videographer
20		20	
21		21	
22	Job No. 570052	22	
23	Pages 1 - 99	23	
24	Stenographically Reported by:	24	
25	Susan S. Klinger, RMR-CRR, CSR	25	
2	2	1	INDEX
3		2	
4	February 22, 2025	3	WITNESS PAGE
5		4	JEFFREY GREEN
6		5	EXAMINATION BY MR. LAKE 5
7	REMOTE VIDEOTAPED DEPOSITION OF JEFFREY GREEN,	7	E X H I B I T S
8	produced as a witness at the instance of the	8	No. Description
9	Defendants, and duly sworn, was taken in the	9	Exhibit 1 Subpoena 11
10	above-styled and numbered cause on the 22nd of	10	Exhibit 2 U.S. Patent 8,588,110 36
11	February, 2025, from 10:01 to 13:16, before Susan	11	Exhibit 3 U.S. Patent 8,639,811 39
12	S. Klinger, RMR-CRR, CSR in and for the States of	12	Exhibit 4 U.S. Patent 9,179,359 43
13	Texas and California, reported by stenographic	13	Exhibit 5 U.S. Patent 9,647,918 45
14	method, pursuant to the Federal Rules of Civil	14	
15	Procedure and the provisions stated on the record	15	
16	or attached hereto.	16	
17		17	
18		18	
19		19	
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2 (5 to 8)

	5	
1	PROCEEDINGS	
2	VIDEOGRAPHER: Here begins Media Number 1	
3	in the videotaped deposition of Jeff Green in the	
4	matter of Headwater Research, LLC v. Samsung	
5	Electronics Company Limited, et al, in the United	
6	States District Court for the Eastern District of	
7	Texas, Marshall Division, Case Number	
8	2:23-CV-00641.	
9	Today's date is February 22, 2025. The	
10	time on the video monitor is 10:01. The remote	
11	videographer today is John Gugarty representing	
12	Planet Depos. All parties of this video	
13	deposition are attending remotely.	
14	Would counsel please voice-identify	
15	themselves and state whom they represent?	
16	MR. LAKE: Steffen Lake on behalf of	
17	Samsung.	
18	MR. KROEGER: Paul Kroeger on behalf of	
19	plaintiff Headwater and the witness, Mr. Green.	
20	VIDEOGRAPHER: The court reporter today is	
21	Susan Klinger also representing Planet Depos. The	
22	witness will now be sworn.	
23	JEFFREY GREEN,	
24	having been first duly sworn testified as follows:	
25	EXAMINATION	
	6	
1	BY MR. LAKE	
2	Q Good morning, Mr. Green.	
3	A Good morning.	
4	Q Could you please start by stating your	
5	full name for the record?	
6	A Yeah, Jeffrey Martin Green.	
7	Q And who is your current employer,	
8	Mr. Green?	
9	A My current employer is a company called	
10	Arctic Wolf.	
11	Q And where is your primary residence?	
12	A Nashville, Tennessee.	
13	Q And I know that you have taken at least or	
14	you have sat for at least one deposition before	
15	because I took that one, but have you had any	
16	other depositions besides that?	
17	A I've had a second deposition, yes.	
18	Q In what case was your other deposition?	
19	A It was a case with AT&T and Verizon.	
20	Q Could you briefly describe the general	
21	subject matter of your deposition?	
22	A It was around a patent, if I'm recalling	
23	correctly, around the service design center.	
24	Q Have you ever offered testimony at a	
25	trial?	
	7	
1	A Have I offered, no, I've not been to a	
2	trial.	
3	Q I apologize, have you ever testified at	
4	trial before?	
5	A No.	
6	Q So I'm sure you are starting to get the	
7	hang of this deposition procedure a little bit by	
8	now, but do you mind if we just run through the	
9	preliminaries to make sure we're on the same page	
10	for today?	
11	A Sure.	
12	Q So you understand that you're testifying	
13	under oath and under the penalty of perjury in the	
14	United States?	
15	A I do.	
16	Q The same as if you were testifying live in	
17	a United States courtroom, correct?	
18	A Correct.	
19	Q If at any point today you don't fully	
20	understand a question that I'm asking, will you	
21	let me know and give me an opportunity to rephrase	
22	that question?	
23	A Sure.	
24	Q So then is it fair that if you do answer a	
25	question, I can assume that you understood the	
	8	
1	question?	
2	A Yes.	
3	Q On behalf of our court reporter today, I	
4	will just ask that you give a verbal answer for	
5	all of my questions. Sometimes it is normal to	
6	give a head nod or an uh-huh answer, but it will	
7	be easier on our reporter if you could just give a	
8	clear, verbal answer to each question; is that	
9	fair?	
10	A Yes.	
11	Q And on that tone for our court reporter,	
12	let's both do our best to not talk over one	
13	another. I will do my best to let you finish your	
14	answer completely before I begin my next question,	
15	and I would ask that you let me complete my	
16	question before starting to answer. Does that	
17	sound okay?	
18	A Yes.	
19	Q I will try to give you a break about every	
20	hour or so, but if you need one for any other	
21	reason, please let me know and I can try to make	
22	room for one as soon as possible. But I will just	
23	note that if there is a question pending I will	
24	need an answer for that question before we can go	
25	to a break.	

	17		19
1 unless I was -- I was required to do so.		1 A There it was really defining, like, the	
2 Q So you would prefer not to; is that fair?		2 roadmap. Defining the features and releases	
3 A I have -- I have a very demanding job and		3 with -- with the product management folks.	
4 it keeps me extremely busy.		4 Q Could you briefly describe for me what you	
5 Q That is completely understandable.		5 mean by product roadmaps?	
6 So I understand you are being represented		6 A Yeah. A roadmap is a set of releases	
7 by Headwater's lawyers from the law firm of Russ		7 that, you know, would have groupings of features	
8 August & Cabot today; is that correct?		8 in them that we would be aiming to deliver, you	
9 A That is correct.		9 know, either on the platform or either on the	
10 Q How did you come to be represented by the		10 handset.	
11 law firm of Russ August?		11 Q When you distinguish between a handset and	
12 A I had a discussion with Paul sometime back		12 -- I'm sorry, I have forgotten to open up the	
13 -- I forget the timeline and, you know, decided to		13 realtime transcript. Can you remind what that	
14 let them represent me instead of, you know,		14 other word was you used?	
15 finding other counsel.		15 A I used the word platform.	
16 Q Did you consider finding other counsel to		16 Q Could you describe for me the distinction	
17 represent you?		17 between platform and handset?	
18 A No.		18 A Typically we refer to the software, you	
19 Q Are you paying your lawyers to represent		19 know, that goes on an Android device to -- to	
20 you during this testimony?		20 perform the functions that -- that they needed to	
21 A I am not.		21 perform in terms of, you know, managing data and	
22 Q Do you know who is paying your lawyers?		22 so on and so forth and voice, et cetera. We refer	
23 A I do not, no.		23 to that as the handset, but you could think of it	
24 Q Would it surprise you if Headwater was		24 as a mobile phone.	
25 paying your lawyers to represent you today?		25 The platform was, you know, back-end some	
	18		20
1 A I don't know the arrangement they have to		1 servers where the server software was running that	
2 be honest whether they're being paid by Headwater		2 communicated with the mobile device, the handset.	
3 or on contingency or something. I don't honestly		3 Q And did you have distinct teams of	
4 know, so...		4 engineers that would work on either the handset	
5 Q If I recall correctly in your last		5 side or the platform side?	
6 deposition you testified that you were employed by		6 A We did, yes. We had a server team and a	
7 ItsOn from October of 2010 through March of 2013;		7 handset client team.	
8 is that correct?		8 Q And those teams consisted of engineers?	
9 A I believe that's correct, yes.		9 A They did, yes.	
10 Q And did you have a particular position or		10 Q Do you have any familiarity with a	
11 a particular title while working at ItsOn?		11 gentleman by the name of Andre Iancu? That is	
12 A Yeah, I was running the engineering team		12 spelled I-a-n-c-u.	
13 and product management team at the time.		13 A That name isn't familiar to me, that I	
14 Q Were you working in both of those roles		14 recall.	
15 simultaneously?		15 Q Do you have any familiarity with a	
16 A Yes.		16 gentleman by the name of Jonathan Kagan,	
17 Q What were your roles for each of those		17 K-a-g-a-n?	
18 positions? We can start with engineering team.		18 A I'm not familiar. I don't recall anyone	
19 A For the engineering team, you know, I was		19 by that name.	
20 working with engineers to facilitate the building		20 Q Do you have any familiarity with a	
21 of the product, you know, coding the product,		21 gentleman by the name of Roger Sippl, S-i-p-p-l?	
22 testing the product. The usual kind of		22 A I have met Roger Sippl, yes.	
23 engineering-type responsibilities.		23 Q In what context did you meet Mr. Sippl?	
24 Q And what were your roles as manager of the		24 A I got introduced to him by Greg Raleigh.	
25 product management team?		25 Roger was, I believe, an investor in ItsOn. I'm	